

EXHIBIT A

32. Safe Ride Matching. Uber had the capability to, and did, identify sets of factors that, when present, predict a substantially higher likelihood of sexual assault occurring during an Uber ride. Those predictive factors include but are not limited to: proprietary factors

[REDACTED], and [REDACTED].

33. At all relevant times, the Uber App automatically collected data on trips, riders, and drivers and ingested that data into its algorithm which is then used to, among other things, adjust pricing and trip times in the surrounding area. Uber had the capability to use data on riders, drivers, and trips—including specifically data correlated with predictive factors including proprietary factors

[REDACTED], and [REDACTED]—to block trip pairings in the presence or one or more high-risk factor predictive of sexual assault.

36. The high-risk factors attendant to Plaintiff's ride and known to Uber included but are not limited to: proprietary factors

and [REDACTED].